

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
Erin M. Kocotis	:	
DEBTOR	:	BKY. NO. 17-16362MDC13
Erin M. Kocotis	:	
Plaintiff	:	
vs.	:	ADV. NO.
PHFA	:	
Defendant	:	

**COMPLAINT TO DETERMINE SECURED STATUS of 3<sup>rd</sup> Mortgage, PHFA**

1. Debtor filed for protection under Chapter 13 on September 18, 2017.
2. Debtor owns her residence 4221 Fairdale Road, Philadelphia, PA with an appraised value of \$120,000. Exhibit A.
3. Debtor has City liens of approximately \$5,700 and a 1<sup>st</sup> mortgage with Nationstar of approximately \$128,000 for senior liens totally \$133,700.
4. The 2<sup>nd</sup> mortgage to PHH in the approximate amount of \$58,000 is wholly unsecured.
5. The 3<sup>rd</sup> mortgage debt to PHFA in the amount of \$9,469 is wholly unsecured.

WHEREFORE, Debtor prays that this Honorable Court entered an order finding the 3<sup>rd</sup> mortgage to PHFA wholly unsecured pursuant to 11 USC 506 and in Re: McDonald

Respectfully submitted,

Date: **October 3, 2017**

BY: /s/ Michael A. Cataldo  
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